

**From:** [Mescher, Jean](#)  
**To:** [Shawn Ghose/R6/USEPA/US@EPA](#)  
**Subject:** Re: Arkwood  
**Date:** 06/15/2011 09:27 AM

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Shawn, we don't know if there are any contaminants above the current clean up standards outside the capped area because our verification levels were different in the past. I think that it is unlikely but we would have to review the detection levels. As long as the cap is undisturbed, the remedy is fine. Since the clean up levels are under review, it would be appropriate to restrict any disturbance to the whole site - not just the capped area. Jean

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**From:** Ghose.Shawn@epamail.epa.gov [mailto:Ghose.Shawn@epamail.epa.gov]  
**Sent:** Tuesday, June 14, 2011 02:50 PM  
**To:** Mescher, Jean  
**Subject:** Re: Arkwood

Jean:: ADEQ made a comment that the present clean up values from Screening Levels, for soil is 2.7 mg/kg for PCP, 1.8E-05 mg/kg Dioxin, and 0.21 mg /kg . All soils which exceed these levels and would not be contained in the no dig restricted as it is currently defined, would need to be protected by a no-dig restriction as well ( comment by Marilyn Egan). In response I stated that Screening Levels would not be applicable and provided the following paragraph provided by EPA HQ:

EPA's dioxin reassessment has been developed and undergone review over many years with the participation of scientific experts in EPA and other federal agencies, as well as scientific experts in the private sector and academia. The Agency followed current cancer guidelines and incorporated the latest data and physiological/biochemical research into the assessment. The results of the assessment have currently not been finalized or adopted into state or federal standards. In addition, EPA/OSWER has proposed to revise the interim preliminary remediation goals (PRGs) for dioxin and dioxin-like compounds based on technical assessment of scientific and environmental data. However, EPA has not made any final decisions on interim PRGs at this time. Therefore, the dioxin toxicity reassessment for this Site will be updated during the next Five Year Review. As long as the Site cap remains undisturbed, the Site is protective of human health and the environment and the remedy selection is still valid.

Is there material outside the capped area which has to be protected with no\_dig area ?? Also in response to my comments Diana Kilburn made the following remark;

Dear Mr. Ghose,

The risk based screening levels for PCP, benzo(a) pyrene, and dioxin have been updated several times since the ROD was finalized. Part of any CERCLA 5 year review is to evaluate the remedy relative to the current standards. A change to the remedy is not implied by this comparison, but an evaluation of the remedy in light of updated risk based standards is necessary. This evaluation should include why the present remedy is still protective and changes are not needed.

ADEQ comments were not in reference to the proposed changes for dioxin, but to the current (December 2010) values at the time of the 5 year review. The evaluation relative to currently protective levels is necessary.

Sincerely,  
Dianna Kilburn

jean: ON THE PROCEDURE FOR THE ANALYSIS PROVIDE usgs WITH THE SAME PROTOCOL  
THAT MCKESSON

Shawn Ghose RPM

We are signing without any wait for Grishams

Arkwood

Mescher, Jean

to: Shawn Ghose

06/14/2011 03:26 PM

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Shawn,

I just arrived in San Francisco and picked up your message. Would you please send me the specific questions and I will try to provide answers. I won't be back in my office until late Thursday but may have the required information on my computer.

On a slightly different topic, the USGS asked for a copy of the water sampling SAP and QAPP. Since my copies are deep in the storage boxes and likely way out of date, I would suggest that we prepare updated documents. Is this alright with you?

Have you had any further interactions with the Grishams?

Jean